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April 5, 2010

Ms. Nancy Sutley, Chair
Council on Environmental Quality
The White House
1600 Pennsylvania Avenue NW
Washington, DC. 20500

Proposed Principles and Standards for Water Resources Studies

Dear Ms. Sutley:

This is a comment on the Proposed Revisions to the National Objectives, Principles, and Standards for Water and Related Resources.

We urge that the proposed revisions be adopted immediately. We are aware that the National Wildlife Federation, the Corps Reform Network, and others have some reservations about the Principles and Standards in the present form. While we agree with those reservations, we have a greater concern that a continued period of revision will permit many unsound projects to go forward. The current revision, however imperfect, is a substantial improvement over the existing situation.

We suggest that the proposed Principles and Standards be adopted on an interim basis. The proposed revision is so different from the existing Principles and Guidelines that a period of experience in actual studies should be useful in formulating the final version. And such interim implementation would prevent much environmental damage from reckless projects now under consideration.

One such project is a plan to dredge the Cape Fear River in North Carolina for a proposed container terminal at Southport. Our organization was formed to develop and disseminate information on that project. We have found that the project is both environmentally and economically unsound, yet it proceeds.

We have prepared a draft "section 905(b)" study for that project using the CEQ Proposed Principles and Standards, December 3, 2009 revision. That study is posted at <http://www.noportsouthport.org/mambo/images/stories/PDFfiles/Recon5.pdf>. You may find it useful.

Very truly yours

A handwritten signature in dark ink, appearing to read "Michael Rice". The signature is fluid and cursive, with a large, stylized "M" and "R".

Michael Rice, Steering Committee